

KEYSPAN ENERGY DELIVERY
D.T.E. 05-71

FIRST SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO KEYSPAN ENERGY DELIVERY

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy (“Department”) submits to Keyspan Energy Delivery the following Information Requests:

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, microfilm, microfiche, audio recordings, video recordings, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals, electronic mail or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, please notify the Hearing Officer so that the

request may be clarified prior to the preparation of a written response.

7. If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.
8. Please serve a copy of the responses as follows: (a) an original and four (4) copies to Mary Cottrell, Secretary of the Department; also submit one (1) copy of all written documents in electronic formation using one of the following methods: (1) by e-mail attachment to det.efiling@state.ma.us and to John.J.Keene@state.ma.us and to George.Yiankos@state.ma.us; or (2) on a 3.5" disk, IBM-compatible format. The text of the e-mail or the disk label must specify: (1) the docket number of the proceeding (D.T.E. 05-71), (2) name of the person or company submitting the filing, and (3) a brief descriptive title of the document (e.g., Response to Information Requests). The electronic filing should also include the name, title and phone number of a person to contact in the event of questions about the filing. Text responses should be created in either Corel WordPerfect, Microsoft Word, or as an Adobe-compatible PDF file. Data or spreadsheet responses should be compatible with Microsoft Excel. Documents submitted in electronic format will be posted on the Department's Website, <http://www.mass.gov/dte>.

Requests

- DTE 1-1 Please give a complete and detailed explanation as to why Keyspan's RCS surcharge for the Colonial Gas service territory (Lowell Division) is nearly two times greater than that approved by the Department for CY 2005.
- DTE 1-2 Please give a complete and detailed explanation as to why Keyspan's RCS surcharge for the Essex Gas service territory is more than two times greater than that approved by the Department for CY 2005.

Dated: December 21, 2005